

Alan J. Lipkin
Shaunna D. Jones
Anna C. Burns
WILLKIE FARR & GALLAGHER LLP
787 Seventh Avenue
New York, New York 10019
Tel: (212) 728-8000
Fax: (212) 728-8111

-----X
In re : Chapter 11
:
Interfaith Medical Center, Inc.,¹ : Case No. 12-48226 (CEC)
:
Debtor. :
-----X

**NOTICE OF AGENDA OF MATTERS SCHEDULED FOR
HEARING ON SEPTEMBER 11, 2013 AT 10:00 A.M. (EASTERN TIME)²**

Location of Hearing: The Honorable Carla E. Craig, Courtroom 3529
United States Bankruptcy Court
Eastern District of New York
271 Cadman Plaza East, Suite 1595
Brooklyn, New York 11201-1800

I. MATTER GOING FORWARD

1. Debtor's Motion for Entry of an Order Pursuant to Sections 105, 363 and 1108 of the Bankruptcy Code, Authorizing the Debtor to Implement, in Accordance with New York State Law, a Plan of Closure for the Debtor's Hospital and Certain Affiliated Outpatient Clinics and Practices [Docket No. 602].

Objections and Responses:

Limited Response of Comprehensive Archives, Inc. to the Debtor's Motion for Entry of an Order Pursuant to Sections 105, 363 and 1108 of the Bankruptcy Code, Authorizing the Debtor to Implement, in Accordance with New York State Law, a Plan of Closure for the Debtor's Hospital and Certain Affiliated Outpatient Clinics and Practices [Docket No. 621].

¹ The last four digits of the Debtor's federal tax identification number are 6155. The Debtor's mailing address is 1545 Atlantic Avenue, Brooklyn, New York 11213.

² Additional time is available on Thursday, September 12, 2013 at 10:00 a.m. (Eastern Time) and Friday, September 13, 2013 at 9:00 a.m. (Eastern Time) to the extent, if any, necessary.

Objection of Keep Interfaith Medical Center Open for Care to the Debtor's Motion for Entry of an Order Pursuant to Sections 105, 363 and 1108 of the Bankruptcy Code, Authorizing the Debtor to Implement, in Accordance with New York State Law, a Plan of Closure for the Debtor's Hospital and Certain Affiliated Outpatient Clinics and Practices [Docket No. 624].

Reservation of Rights of the Official Committee of Unsecured Creditors with Respect to Debtor's Motion for Entry of an Order Pursuant to Section 105, 363 and 1108 of the Bankruptcy Code, Authorizing the Debtor to Implement, in Accordance with New York State Law, a Plan of Closure for the Debtor's Hospital and Certain Affiliated Outpatient Clinics and Practices [Docket No. 642].

Opposition of the Committee of Interns and Residents/Service Employee International Union to Debtor's Motion for Entry of an Order Authorizing the Debtor to Implement a Plan of Closure for the Debtor's Hospital and Certain Affiliated Outpatient Clinics and Practices [Docket No. 643].

Notice of Withdrawal of Opposition of the Committee of Interns and Residents/Service Employee International Union to Debtor's Motion for Entry of an Order Authorizing the Debtor to Implement a Plan of Closure for the Debtor's Hospital and Certain Affiliated Outpatient Clinics and Practices [Docket No. 702]

Objection of 1199SEIU United Healthcare Workers East and the New York State Nurses Association to Debtor's Motion for Entry of an Order Authorizing the Debtor to Implement a Plan of Closure for the Debtor's Hospital and Certain Affiliated Outpatient Clinics and Practices [Docket No. 644].

Exhibits to Objection of 1199SEIU United Healthcare Workers East and the New York State Nurses Association to Debtor's Motion for Entry of an Order Authorizing the Debtor to Implement a Plan of Closure for the Debtor's Hospital and Certain Affiliated Outpatient Clinics and Practices [Docket No. 650].

Objection of IM Foundation, Inc. to Debtor's Motion for Entry of an Order Pursuant to Sections 105, 363 and 1108 of the Bankruptcy Code, Authorizing the Debtor to Implement, in accordance with New York State Law, a Plan of Closure for the Debtor's Hospital and Certain Affiliated Outpatient Clinics and Practices [Docket No. 647].

IM Foundation, Inc. Proffer of Witnesses Testimony [Docket No. 651].

A&M Plan Filed by IM Foundation, Inc. [Docket No. 652].

Objection Of Bill de Blasio, Individually And In His Capacity As The Public Advocate For The City Of New York To Debtors Motion For Entry Of An Order Pursuant To Sections 105, 363 And 1108 Of The Bankruptcy Code, Authorizing The Debtor To Implement, In Accordance With New York State Law, A Plan Of Closure For The Debtors Hospital And Certain Affiliated Outpatient Clinics And Practices; And Cross-Motion For Entry Of An Order (I) Pursuant To Fed. R. Bankr. P. 2018(a) Authorizing Bill De Blasio To Permissively Intervene In The Debtors Chapter 11 Case, And (II) Pursuant To Sections 362(d) And 105 Of The Bankruptcy Code, Fed. R. Bankr. P. 4001, And Local Bankruptcy Rule 4001-1 For Relief From The Automatic Stay To Permit Bill De Blasio To Initiate A New York State Court Action Against Non-Debtors [Docket No. 648].

Objection of the Ad Hoc Group of Doctors to the Debtor's Plan of Closure [Docket No. 654]. [This objection will be withdrawn at the hearing.]

Debtor's Reply and Other Filings in Support of the Motion:

Joinder and Reservation of Rights of the Dormitory Authority of the State of New York With Respect to the Motion of the Debtor for Entry of an Order Authorizing Implementation of a Plan of Closure [Docket No. 640].

Omnibus Response of the Official Committee of Unsecured Creditors with Respect to (I) Debtor's Motion for Entry of an Order Pursuant to Sections 105, 363 and 1108 of the Bankruptcy Code, Authorizing the Debtor to Implement, in Accordance with New York State Law, A Plan of Closure for the Debtor's Hospital and Certain Affiliated Outpatient Clinics and Practices and (II) Motion of IM Foundation, Inc. for an Order Pursuant to Bankruptcy Code § 1121(d) Terminating Exclusive Periods During Which Only the Debtor May File and Solicit Acceptances of a Chapter 11 Plan [Docket No. 664].

Debtor's Reply to Objections to Debtor's Motion for Entry of an Order Pursuant to Sections 105, 363 and 1108 of the Bankruptcy Code, Authorizing the Debtor to Implement, in Accordance with New York State Law, a Plan of Closure for the Debtor's Hospital and Certain Affiliated Outpatient Clinics and Practices [Docket No. 665].

Declaration of John D. Leech in Support of Debtor's Motion for Entry of an Order Pursuant to Sections 105, 363 and 1108 of the Bankruptcy Code, Authorizing the Debtor to Implement, in Accordance with New York State Law, a Plan of Closure for the Debtor's Hospital and Certain Affiliated Outpatient Clinics and Practices [Docket No. 673].

Declaration of Bernard A. Katz in Support of Debtor's Motion for Entry of an Order Pursuant to Sections 105, 363 and 1108 of the Bankruptcy Code, Authorizing the Debtor to Implement, in Accordance with New York State Law, a Plan of Closure for the Debtor's Hospital and Certain Affiliated Outpatient Clinics and Practices [Docket No. 671].

Notice of Amended and Restated Declaration of Bernard A. Katz in Support of Debtor's Motion for Entry of an Order Pursuant to Sections 105, 363 and 1108 of the Bankruptcy

Code, Authorizing the Debtor to Implement, in Accordance with New York State Law, a Plan of Closure for the Debtor's Hospital and Certain Affiliated Outpatient Clinics and Practices [Docket No. 699].

Debtor's Proffer of Witnesses' Testimony and Exhibits and Statement of Disputed Facts for the August 26, 2013 Hearing on the Debtor's Motion for Entry of an Order Pursuant to Sections 105, 363 and 1108 of the Bankruptcy Code, Authorizing the Debtor to Implement, in Accordance with New York State Law, a Plan of Closure for the Debtor's Hospital and Certain Affiliated Outpatient Clinics and Practices [Docket No. 678].

Supplement to Debtor's Motion for Entry of an Order Pursuant to Sections 105, 363 and 1108 of the Bankruptcy Code, Authorizing the Debtor to Implement, in Accordance with New York State Law, a Plan of Closure for the Debtor's Hospital and Certain Affiliated Outpatient Clinics and Practices [Docket No. 606].

Second Supplement to Debtor's Motion for Entry of an Order Pursuant to Sections 105, 363 and 1108 of the Bankruptcy Code, Authorizing the Debtor to Implement, in Accordance with New York State Law, a Plan of Closure for the Debtor's Hospital and Certain Affiliated Outpatient Clinics and Practices [Docket No. 627].

Third Supplement to Debtor's Motion for Entry of an Order Pursuant to Sections 105, 363 and 1108 of the Bankruptcy Code, Authorizing the Debtor to Implement, in Accordance with New York State Law, a Plan of Closure for the Debtor's Hospital and Certain Affiliated Outpatient Clinics and Practices [Docket No. 700].

Notice of Revised Proposed Order Pursuant to Sections 105, 363 and 1108 of the Bankruptcy Code, Authorizing the Debtor to Implement, in Accordance with New York State Law, a Plan of Closure for the Debtor's Hospital and Certain Affiliated Outpatient Clinics and Practices [Docket No. 703].

Additional Related Documents:

Order, dated August 1, 2013, regarding the Debtor's Motion and related matters [Docket No. 605].

Revised Order, dated August 8, 2013, regarding the Debtor's motion and related matters [Docket No. 620].

Debtor's Motion for a Final Order: (I) Authorizing the Debtor to Obtain Postpetition Secured Financing Pursuant to Sections 105, 361, 362, 364, 503(b) and 507(b) of the Bankruptcy Code; (II) Authorizing the Debtor to Use Cash Collateral on a Final Basis Pursuant to Section 363 of the Bankruptcy Code; (III) Providing Adequate Protection Pursuant to Sections 361, 362, and 363 of the Bankruptcy Code; (IV) Modifying the Automatic Stay Pursuant to Section 362(d) of the Bankruptcy Code; (V) Authorizing and Approving a Related Compromise and Settlement Pursuant to Section 363 of the Bankruptcy Code and Bankruptcy Rule 9019; and (VI) Providing Related Relief [Docket No. 638].

Notice of Filing of Revised Proposed Order: (I) Authorizing the Debtor to Obtain Postpetition Secured Financing Pursuant to Sections 105, 361, 362, 364, 503(b) and 507(b) of the Bankruptcy Code; (II) Authorizing the Debtor to Use Cash Collateral on a Final Basis Pursuant to Section 363 of the Bankruptcy Code; (III) Providing Adequate Protection Pursuant to Sections 361, 362, and 363 of the Bankruptcy Code; (IV) Modifying the Automatic Stay Pursuant to Section 362(d) of the Bankruptcy Code; (V) Authorizing and Approving a Related Compromise and Settlement Pursuant to Section 363 of the Bankruptcy Code and Bankruptcy Rule 9019; and (VI) Providing Related Relief, with Revised DIP and Closure Budget Attached [Docket No. 692].

Notice of Filing of Revised Proposed Order: (I) Authorizing the Debtor to Obtain Postpetition Secured Financing Pursuant to Sections 105, 361, 362, 364, 503(b) and 507(b) of the Bankruptcy Code; (II) Authorizing the Debtor to Use Cash Collateral on a Final Basis Pursuant to Section 363 of the Bankruptcy Code; (III) Providing Adequate Protection Pursuant to Sections 361, 362, and 363 of the Bankruptcy Code; (IV) Modifying the Automatic Stay Pursuant to Section 362(d) of the Bankruptcy Code; (V) Authorizing and Approving a Related Compromise and Settlement Pursuant to Section 363 of the Bankruptcy Code and Bankruptcy Rule 9019; and (VI) Providing Related Relief, and Revised DIP Credit Agreement [Docket No. 706].

Status: The hearing on this matter is going forward. The objections of Comprehensive Archives, Inc., the Committee of Interns and Residents/Service Employee International Union, and the Ad Hoc Group of Doctors have been or will be withdrawn prior to the hearing based on language in the revised proposed order.

II. ADJOURNED MATTERS

1. Pre-trial Conference Regarding Interfaith Medical Center, Inc. v. Jasmine Burnett, as mother and natural guardian of L.B. and T.B., Jasmine Burnett, individually, and Fitzgerald & Fitzgerald, P.C., Adv. Pro. No. 13-01154 (CEC).

Status: The hearing on this matter has been adjourned to October 7, 2013 at 2:00 p.m. as the parties continue settlement discussions.

2. Pre-trial Conference Regarding Interfaith Medical Center, Inc. v. Vanessa Lovett, individually, Fitzgerald & Fitzgerald, P.C., I.H., an infant, by his mother and natural guardian, Ernestine Holmes, and C.L., an infant, by his mother and natural guardian, Vanessa Lovett, Adv. Pro. No. 13-01155 (CEC).

Status: The hearing on this matter has been adjourned to October 7, 2013 at 2:00 p.m. as the parties continue settlement discussions.

Dated: September 10, 2013

WILLKIE FARR & GALLAGHER LLP
Attorneys for the Debtor and Debtor in Possession

By: /s/ Alan J. Lipkin
Alan J. Lipkin
Shaunna D. Jones
Anna C. Burns

787 Seventh Avenue
New York, New York 10019
Telephone: (212) 728-8000
Facsimile: (212) 728-8111